



September 25, 2015

California Department of Water Resources
Attn: Sustainable Groundwater Management Section
P.O. Box 942836
Sacramento, CA 94236

Re: Merced Groundwater Basin - Draft List of Critically Overdrafted Basins – August 6, 2015

Dear Mr. Gutierrez,

At least once, the Merced Irrigation District (MID) has discussed the basis of basin designation with DWR staff in the South Central Regional Office. MID was informed that the designation for an entire basin was squarely based on the fact that subsidence occurs in a portion of the basin, regardless of how small an area within the basin that is affected by subsidence. MID received references used by DWR for this designation. MID believes that the basin designation, based on that approach, may not be supportable for two reasons:

1. DWR indicates that the reason the Merced Basin/Subbasin is designated as critically overdrafted under its "Reason for Identification over Period of 1989-2009" is because there is "Subsidence in El Nido area 0.6 to 1.0 ft/year (USGS)". As you know, there is subsidence in the area of Madera County called the "El Nido Subsidence area." That area, which includes the town of El Nido, are currently all part of the Chowchilla Groundwater Basin and not in the Merced Groundwater Basin. Put simply, even though the town of El Nido is within Merced County and the Merced Irrigation District, it is not within the Merced Groundwater Basin, therefore it is not accurate to designate the Merced Basin as critically overdrafted basin on this alone.
2. Reference maps seem to show the possibility of some encroachment of subsidence from the El Nido Subsidence area, while minimal, into the Merced Groundwater Basin. Although this is possible, the references between 1989 and 2009 do not support that. None of the Extensometers used by USGS for monitoring are located even close to the Merced Groundwater Basin. MID does not believe that information suggested by the InSar should be used and relied upon for something as significant as a groundwater basin designation prior to ground verifications.

In addition, the Critically Overdraft designation is narrow and is not descriptive for the Merced Groundwater Basin. DWR Groundwater Contour Maps, between 1989 and 2009, suggest that groundwater migrates downstream in the basin in a northeasterly, southwesterly and southerly

direction. With this designation, Merced Groundwater Basin has to complete a GSP by 2020, while the groundwater basin to the north doesn't need to complete its GSP before 2022. It will be very difficult for the Merced Groundwater Basin to complete an effective plan not knowing the plan for our neighbors to the north. The designation for a basin where groundwater migrates out of the basin makes difficult to meet its five year objectives, since two of these three years are unknown and based on activities of the neighboring basins.

MID encourages DWR to reconsider the designation for the Merced Groundwater Basin, and/or provide some additional means of explanation of compliance with SGMA timelines. Please contact me directly and immediately to discuss this matter further.

Sincerely,



Hicham Eltal
Deputy General Manager, Water Supply/Rights